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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Andrea Nicole Broyles,
Plaintiff,
vs.
Kilolo Kijakazi, Acting
Commissioner of Social Security,
Defendant.

} Case No. 1:21-CV-00445-NONE-BAM

} STIPULATION AND ORDER FOR EXTENSION OF TIME

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IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from December 13, 2021 to February 11, 2021, for Plaintiff to serve on defendant with PLAINTIFF'S LETTER BRIEF. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's first request for an extension of time. The extension request is also late. Good cause exists. On November 17, 2021, Counsel filed a

1 Motion to Withdraw as counsel. (Dkt. No. 16). On November 22, 2021, the Court
2 ordered a hearing on the motion set for January 7, 2022. (Dkt. No. 17). Counsel
3 for the Plaintiff mistakenly marked the current deadline for the Plaintiff's
4 Confidential Letter brief as suspended pending the hearing, however, this was done
5 in error.

6 Counsel is requesting a 60 day extension to allow for a ruling on the motion
7 which will be heard on January 7, 2022.

8 Defendant does not oppose the requested extension. Counsel apologizes to
9 the Defendant and Court for any inconvenience this may cause.

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12 Respectfully submitted,
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14 Dated: December 16, 2021 PENA & BROMBERG, ATTORNEYS AT LAW
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16 By: /s/ Jonathan O. Peña
17 JONATHAN O. PENA
18 Attorneys for Plaintiff
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20 Dated: December 16, 2021 PHILLIP A. TALBERT
21 Acting United States Attorney
22 PETER K. THOMPSON
23 Acting Regional Chief Counsel, Region IX
Social Security Administration
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25 By: */s/ Jeffrey E. Staples
26 Jeffrey E. Staples
27 Special Assistant United States Attorney
28 Attorneys for Defendant
(*As authorized by email on December 16, 2021)

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2 **ORDER**
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4 Pursuant to the parties' request, and for good cause shown, IT IS SO ORDERED that
5 Plaintiff shall have an extension, up to and including February 11, 2022, to file Plaintiff's Letter
6 brief. All other dates in the Court's Scheduling Order (Doc. No. 5.) shall be extended
7 accordingly.

8 IT IS SO ORDERED.
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10 Dated: December 17, 2021

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12 */s/ Barbara A. McAuliffe*

13 UNITED STATES MAGISTRATE JUDGE
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